

# Exhibit 3

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION

B.P., H.A., and S.H., )  
individually, and on behalf of )  
all others similarly )  
situated, )

Plaintiffs, )

v. )

No. 2:23-CV-00071  
TRM-JEM

City of Johnson City, )  
Tennessee, et al, )

Defendants. )

\* \* \* \* \*

VIDEO DEPOSITION OF MATTHEW GRYDER

August 7, 2024

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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JEFF RUSK COURT REPORTING & VIDEO

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23 Videographer: Chris Rusk

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1 has access to that, as they do my home address.

2 Q. Okay. I'm just going to keep  
3 going.

4 What's your personal cell phone  
5 number?

6 A. It's [REDACTED] 9775.

7 Q. What about your work?

8 A. [REDACTED] 4139.

9 Q. And what about your FBI phone  
10 number?

11 A. [REDACTED] 6038.

12 Q. What about Mike Adams' FBI phone  
13 number? Do you know that?

14 A. No, I don't.

15 Q. Did you bring your phone with you  
16 today?

17 A. No, I did not.

18 Q. Are you able to look during a break  
19 at your phone?

20 A. I don't have it here.

21 Q. Okay. Do you know whether Mike  
22 Adams and Joe Jaynes still have their FBI-issued  
23 cell phones?

24 A. No, Mike Adams does not.

25 Q. Okay.

1                   A.           And I'm not sure about Joe Jaynes.  
2    I don't know.

3                   Q.           How do you know that Mike Adams  
4    doesn't have his FBI phone number anymore?

5                   A.           Because he left the task force,  
6    went back to the Washington County Sheriff's Office,  
7    and he's retiring next week.

8                               It's not the Mike Adams that works  
9    for the police department.

10                  Q.           Oh, okay.

11                  A.           It's confusing. This Mike Adams,  
12    his first name is Herbert. His middle name is  
13    Michael, but he goes by Mike.

14                  Q.           And you said he went back to which  
15    sheriff office?

16                  A.           Washington County.

17                  Q.           And when was he a TFO with you at  
18    FBI?

19                  A.           I think he started in 2012, and I'm  
20    not certain when he left.

21                  Q.           Okay. Do you use any messaging  
22    apps on your personal cell phone?

23                  A.           Yes.

24                  Q.           What are those?

25                  A.           I use Signal. Occasionally

1 Facebook Messenger.

2 Q. What do you use Signal for?

3 A. To communicate with friends.

4 Q. For what purpose? Like why not  
5 just use the regular texting app?

6 A. That's just the app that they use.

7 Q. Do you text other JCPD officers on  
8 Signal?

9 A. I do.

10 Q. When do you do that?

11 A. I'm sorry. I don't understand the  
12 question.

13 Q. When would -- like for what purpose  
14 would you do that?

15 A. To communicate.

16 Q. Okay. Which officers do you text  
17 on Signal?

18 A. Andy Clevenger. Michael Barron.  
19 They're both friends of mine.

20 Q. Anyone else?

21 A. Not as far as JCPD officers, no.

22 Q. Do you use your personal cell phone  
23 for work purposes at times?

24 A. It's not my practice to use my  
25 personal phone for work. I do talk to people I work

1 with on my personal phone and occasionally, you  
2 know, we're coworkers, the conversations are about  
3 work.

4 Q. And do you text folks from your  
5 personal cell phone at work about work?

6 A. I don't text people that I work  
7 with from my personal cell phone at work, from work.  
8 That's --

9 Q. Sorry. That's a bad question.  
10 Do you ever use -- you said you  
11 sometimes talk about work matters in the course of  
12 talking to another -- in talking to JCPD officers,  
13 JCPD officers who might have called you on your  
14 personal cell phone.

15 Does that ever happen in text  
16 messages that come to your personal cell phone?

17 A. That's not my practice. I -- I  
18 can't say. Has it ever happened? I don't know.  
19 It's possible. It could have happened.

20 Q. How long have you been a JCPD  
21 officer?

22 A. For 25 years.

23 Q. And what did you do before that?

24 A. I worked security before that.

25 Q. And what kind of assignments have